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2-14-02

SC

Original

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

William Hazzard,

Plaintiff

v.

Tim Curtis, Mack McMurray, AFSCME
District 90, and the Harrisburg School
District,

Defendants

Civil Action-Law

No. 1:CV-00-1758

2/14/02

FILED

HARRISBURG, PA

FEB 13 2002

MARY E. D'ANDREA, CLERK
Per 9/15

MOTION OF DEFENDANTS
AFSCME DISTRICT COUNCIL 90 AND ROBERT McMURRAY
TO FILE BRIEF IN EXCESS OF FIFTEEN PAGES
PURSUANT TO LOCAL RULE 7.8

Defendants, AFSCME District Council 90 ("AFSCME") and Robert McMurray, by and through their undersigned counsel, hereby move, pursuant to Local Rule 7.8, for leave to file a brief in excess of fifteen pages in length in connection with the Motion for Summary Judgment that Defendants will file on Friday, February 15, 2002, in support whereof Defendants aver as follows:

1. By order of the Court, Pre-Trial Motions and supporting briefs must be filed by February 15, 2002.
2. Local Rule 5.1(c) requires that the typeface on all documents filed in the Court must be no less than fourteen (14) points.
3. Local Rule 7.8 provides that briefs, including briefs on motions, are limited to fifteen (15) page in length.
4. Defendants require more than fifteen (15) pages in fourteen (14) point type for their brief in support of their Motion for Summary Judgment.
5. Defendants seek leave to file a brief of up to thirty (30) pages in length.
6. Counsel for Defendants AFSCME and McMurray has communicated with counsel for Plaintiff and counsel for Defendants Harrisburg School District, and neither counsel has objected to this request.

WHEREFORE, Defendants McMurray and AFSCME respectfully request that this Court grant leave to file a brief of up to thirty (30) pages in length in support of their Motion for Summary Judgment.

Respectfully submitted,
WILLIG, WILLIAMS & DAVIDSON

BY: _____

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Attorneys for Defendants
McMurray and AFSCME

Dated: February 12, 2002

CERTIFICATE OF SERVICE

I, Eric M. Fink, hereby certify that I have this day sent a copy of the Motion for Summary Judgment in the foregoing matter to the counsel listed below, by first class mail, postage prepaid:

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Eric M. Fink

Dated: February 12, 2002